

[Parties and Counsel Listed on Signature Pages]

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

**STIPULATION AND [PROPOSED]
ORDER GOVERNING DISCOVERY
LIMITATIONS**

Plaintiffs and Defendants (each a “Party” and collectively the “Parties”) hereby submit the following Stipulation and [Proposed] Order Governing Discovery Limitations.

STIPULATION

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO THE COURT’S APPROVAL:

1. Plaintiffs as a group (including the JCCP Plaintiffs)¹ are allotted a combined total of up to 45 Interrogatories for each of the four main Defendant groups (*i.e.*, Meta, TikTok, Snap, and

¹ “Plaintiffs” refers to the MDL Personal Injury (“PI”) Plaintiffs, MDL School District and Local Government Entity (“SD”) Plaintiffs (together with the PI Plaintiffs, the “PI/SD Plaintiffs”), the MDL State Attorneys General (“State AGs”), and the JCCP Plaintiffs.

1 YouTube). The State AGs are further allotted a combined total of eight (8) additional Interrogatories for
 2 the Meta Defendants.

3 2. Plaintiffs as a group (including the JCCP Plaintiffs) are allotted a combined total of
 4 up to 45 Requests for Admission (“RFAs”) for each of the four main Defendant groups (*i.e.*, Meta,
 5 TikTok, Snap, and YouTube).² The State AGs are further allotted a combined total of up to eight (8)
 6 additional RFAs for the Meta Defendants.

7 3. The Meta Defendants are allotted a combined total of up to 32 identical
 8 Interrogatories for each State AG. The Meta Defendants are further allotted a combined total of up to
 9 six (6) additional State-specific Interrogatories for each State AG.³

10 4. The Meta Defendants are allotted a combined total of up to 32 identical RFAs for
 11 each State AG. The Meta Defendants are further allotted a combined total of up to six (6) additional
 12 State-specific RFAs for each State AG.

13 Depositions

14 5. In addition to the 35 hours of depositions of each bellwether SD Plaintiff permitted by
 15 the Court, Defendants are allotted a combined total of up to ten (10) hours for Rule 30(b)(6) depositions
 16 of each bellwether SD Plaintiff.

17 6. Depositions of treating providers in any given bellwether PI case may not exceed five
 18 (5) hours of questioning by the Defendants.

19 7. With the exception of minors and treating providers, depositions of all other
 20 witnesses in any given bellwether PI case may not exceed seven (7) hours of questioning by the
 21 Defendants, and depositions of all other witnesses in any given bellwether SD case may not exceed ten
 22 (10) hours of questioning by the Defendants. The Parties shall meet and confer in advance of each
 23 deposition regarding estimated time lengths.

24 _____
 25 ² The limitations on RFAs set forth in this Order do not include any RFAs that may be needed for
 26 purposes of authentication (to the extent the Parties are not able to stipulate to the authentication of
 documents through other means).

27 ³ The State AGs note that their agreements regarding interrogatories and RFAs on the State AGs are
 28 subject to their understanding that party discovery—including interrogatories and RFAs—is appropriate
 only as to the State AGs and not as to State agencies.

8. For good cause shown, a Party may seek an expansion or contraction of the discovery limits set forth above on a case-by-case basis or in a specific instance. Any Party seeking an expansion or contraction of the hours limit for a particular deposition shall meet and confer with the other side in advance of the deposition and, if the Parties are unable to agree on the requested expansion or contraction, the Party seeking the modification may raise the dispute with the Court in accordance with the Court's procedures for resolving discovery disputes. However, nothing in this agreement shall be used to delay or alter the ordered limitations of a properly noticed deposition should the dispute not be resolved before the date of the noticed deposition.⁴

IT IS SO STIPULATED, through Counsel of Record.

DATED: March 6, 2024

Respectfully Submitted,

/s/ Lexi J. Hazam

LEXI J. HAZAM

**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**

275 BATTERY STREET, 29TH FLOOR
SAN FRANCISCO, CA 94111-3339

Telephone: 415-956-1000

lhazam@lchb.com

PREVIN WARREN

MOTLEY RICE LLC

401 9th Street NW Suite 630

Washington DC 20004

T: 202-386-9610

pwarren@motleyrice.com

Co-Lead Counsel

CHRISTOPHER A. SEEGER

SEEGER WEISS, LLP

55 CHALLENGER ROAD, 6TH FLOOR

⁴ The Parties further reserve the right to advocate for modifications of discovery limitations, including depositions and other discovery, in the event discovery on a particular Party becomes disproportionate, taking into account relevant factors.

RIDGEFIELD PARK, NJ 07660
Telephone: 973-639-9100
Facsimile: 973-679-8656
cseeger@seegerweiss.com

Counsel to Co-Lead Counsel

JENNIE LEE ANDERSON
ANDRUS ANDERSON, LLP
155 MONTGOMERY STREET, SUITE 900
SAN FRANCISCO, CA 94104
Telephone: 415-986-1400
jennie@andrusanderson.com

Liaison Counsel

RON AUSTIN
RON AUSTIN LAW
400 Manhattan Blvd.
Harvey LA, 70058
Telephone: (504) 227-8100
raustin@ronaustinlaw.com

MATTHEW BERGMAN
GLENN DRAPER
SOCIAL MEDIA VICTIMS LAW CENTER
821 SECOND AVENUE, SUITE 2100
SEATTLE, WA 98104
Telephone: 206-741-4862
matt@socialmediavictims.org
glenn@socialmediavictims.org

JAMES J. BILSBORROW
WEITZ & LUXENBERG, PC
700 BROADWAY
NEW YORK, NY 10003
Telephone: 212-558-5500
Facsimile: 212-344-5461
jbilsborrow@weitzlux.com

PAIGE BOLDT
WATTS GUERRA LLP
4 Dominion Drive, Bldg. 3, Suite 100
San Antonio, TX 78257
T: 210-448-0500
PBoldt@WattsGuerra.com

THOMAS P. CARTMELL

WAGSTAFF & CARTMELL LLP

4740 Grand Avenue, Suite 300

Kansas City, MO 64112

T: 816-701 1100

tcartmell@wcllp.com

JAYNE CONROY

SIMMONS HANLY CONROY, LLC

112 MADISON AVE, 7TH FLOOR

NEW YORK, NY 10016

Telephone: 917-882-5522

jconroy@simmonsfirm.com

CARRIE GOLDBERG

C.A. GOLDBERG, PLLC

16 Court St.

Brooklyn, NY 11241

T: (646) 666-8908

carrie@cagoldberglaw.com

SIN-TING MARY LIU

AYLSTOCK WITKIN KREIS &

OVERHOLTZ, PLLC

17 EAST MAIN STREET, SUITE 200

PENSACOLA, FL 32502

Telephone: 510-698-9566

mliu@awkolaw.com

ANDRE MURA

GIBBS LAW GROUP, LLP

1111 BROADWAY, SUITE 2100

OAKLAND, CA 94607

Telephone: 510-350-9717

amm@classlawgroup.com

EMMIE PAULOS

LEVIN PAPANTONIO RAFFERTY

316 SOUTH BAYLEN STREET, SUITE 600

PENSACOLA, FL 32502

Telephone: 850-435-7107

epaulos@levinlaw.com

ROLAND TELLIS

DAVID FERNANDES

BARON & BUDD, P.C.

15910 Ventura Boulevard, Suite 1600

Encino, CA 91436

Telephone: (818) 839-2333

Facsimile: (818) 986-9698
rtellis@baronbudd.com
dfernandes@baronbudd.com

ALEXANDRA WALSH
WALSH LAW
1050 Connecticut Ave, NW, Suite 500
Washington D.C. 20036
T: 202-780-3014
awalsh@alexwalshlaw.com

MICHAEL M. WEINKOWITZ
LEVIN SEDRAN & BERMAN, LLP
510 WALNUT STREET
SUITE 500
PHILADELPHIA, PA 19106
Telephone: 215-592-1500
mweinkowitz@lfsbalw.com

DIANDRA "FU" DEBROSSE ZIMMERMANN
DICELLO LEVITT
505 20th St North
Suite 1500
Birmingham, Alabama 35203
Telephone: 205.855.5700
fu@dicellolevitt.com

HILLARY NAPPI
HACH & ROSE LLP
112 Madison Avenue, 10th Floor
New York, New York 10016
Tel: 212.213.8311
hnappi@hrsclaw.com

JAMES MARSH
MARSH LAW FIRM PLLC
31 HUDSON YARDS, 11TH FLOOR
NEW YORK, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

Attorneys for Individual Plaintiffs

PHILIP J. WEISER
Attorney General
State of Colorado

/s/ Bianca E. Miyata

1 Bianca E. Miyata, CO Reg. No. 42012,
2 *pro hac vice*
3 Senior Assistant Attorney General
4 Lauren M. Dickey, CO Reg. No. 45773
5 First Assistant Attorney General
6 Megan Paris Rundlet, CO Reg. No. 27474
7 Senior Assistant Solicitor General
8 Elizabeth Orem, CO Reg. No. 58309
9 Assistant Attorney General
10 Colorado Department of Law
11 Ralph L. Carr Judicial Center
12 Consumer Protection Section
13 1300 Broadway, 7th Floor
14 Denver, CO 80203
15 Phone: (720) 508-6651
16 bianca.miyata@coag.gov

17 *Attorneys for Plaintiff State of Colorado, ex rel.*
18 *Philip J. Weiser, Attorney General*

19 **ROB BONTA**

20 Attorney General
21 State of California

22 /s/ Bernard Eskandari

23 Nick A. Akers (CA SBN 211222)
24 Senior Assistant Attorney General
25 Bernard Eskandari (SBN 244395)
26 Supervising Deputy Attorney General
27 Megan O'Neill (CA SBN 343535)
28 Joshua Olszewski-Jubelirer
(CA SBN 336428)
Marissa Roy (CA SBN 318773)
Deputy Attorneys General
California Department of Justice
Office of the Attorney General
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102-7004
Phone: (415) 510-4400
Fax: (415) 703-5480
Bernard.Eskandari@doj.ca.gov

*Attorneys for Plaintiff the People of the State of
California*

RUSSELL COLEMAN

Attorney General
Commonwealth of Kentucky

/s/ J. Christian Lewis

J. Christian Lewis (KY Bar No. 87109),

Pro hac vice

Philip Heleringer (KY Bar No. 96748),

Pro hac vice

Zachary Richards (KY Bar No. 99209),

Pro hac vice app. forthcoming

Daniel I. Keiser (KY Bar No. 100264),

Pro hac vice

Matthew Cocanougher (KY Bar No. 94292),

Pro hac vice

Assistant Attorneys General

1024 Capital Center Drive, Suite 200

Frankfort, KY 40601

CHRISTIAN.LEWIS@KY.GOV

PHILIP.HELERINGER@KY.GOV

ZACH.RICHARDS@KY.GOV

DANIEL.KEISER@KY.GOV

MATTHEW.COCANOUGH@KY.GOV

Phone: (502) 696-5300

Fax: (502) 564-2698

*Attorneys for Plaintiff the Commonwealth of
Kentucky*

MATTHEW J. PLATKIN

Attorney General

State of New Jersey

/s/ Kashif T. Chand

Kashif T. Chand (NJ Bar No. 016752008),

pro hac vice

Section Chief, Deputy Attorney General

Thomas Huynh (NJ Bar No. 200942017),

pro hac vice

Assistant Section Chief, Deputy Attorney General

Gina F. Pittore (NJ Bar No. 323552019),

pro hac vice

Verna J. Pradaxay (NJ Bar No. 335822021),

pro hac vice

Mandy K. Wang (NJ Bar No. 373452021),

pro hac vice

Deputy Attorneys General

New Jersey Office of the Attorney General,

Division of Law

124 Halsey Street, 5th Floor

Newark, NJ 07101

Tel: (973) 648-2052
Kashif.Chand@law.njoag.gov
Thomas.Huynh@law.njoag.gov
Gina.Pittore@law.njoag.gov
Verna.Pradaxay@law.njoag.gov
Mandy.Wang@law.njoag.gov

*Attorneys for Plaintiffs New Jersey Division of
Consumer Affairs*

COVINGTON & BURLING LLP

By: /s/ Ashley M. Simonsen
Ashley M. Simonsen, SBN 275203
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, CA 90067
Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com

Phyllis A. Jones, *pro hac vice*
Paul W. Schmidt, *pro hac vice*
COVINGTON & BURLING LLP
One City Center
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: + 1 (202) 662-6000
Facsimile: + 1 (202) 662-6291
Email: pajones@cov.com

*Attorney for Defendants Meta Platforms, Inc.
f/k/a Facebook, Inc.; Facebook Holdings,
LLC; Facebook Operations, LLC; Facebook
Payments, Inc.; Facebook Technologies, LLC;
Instagram, LLC; Siculus, Inc.; and Mark Elliot
Zuckerberg*

FAEGRE DRINKER LLP
By: /s/ Andrea Roberts Pierson
Andrea Roberts Pierson, *pro hac vice*
Amy Fiterman, *pro hac vice*
FAEGRE DRINKER LLP
300 N. Meridian Street, Suite 2500
Indianapolis, IN 46204
Telephone: + 1 (317) 237-0300
Facsimile: + 1 (317) 237-1000
Email: andrea.pierson@faegredrinker.com

Email: amy.fiterman @faegredrinker.com

GEOFFREY DRAKE, *pro hac vice*
David Mattern, *pro ha vice*
KING & SPALDING LLP
1180 Peachtree Street, NE, Suite 1600
Atlanta, GA 30309
Tel.: 404-572-4600
Email: gdrake@kslaw.com
Email: dmattern@kslaw.com

*Attorneys for Defendants TikTok Inc. and
ByteDance Inc.*

MUNGER, TOLLES & OLSEN LLP
By: /s/ Jonathan H. Blavin
Jonathan H. Blavin, SBN 230269
MUNGER, TOLLES & OLSON LLP
560 Mission Street, 27th Floor
San Francisco, CA 94105-3089
Telephone: (415) 512-4000
Facsimile: (415) 512-4077
Email: jonathan.blavin@mto.com

Rose L. Ehler (SBN 29652)
Victoria A. Degtyareva (SBN 284199)
Laura M. Lopez, (SBN 313450)
Ariel T. Teshuva (SBN 324238)
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, 50th Floor
Los Angeles, CA 90071-3426
Telephone: (213) 683-9100
Facsimile: (213) 687-3702
Email: rose.ehler@mto.com
Email: victoria.degtyareva@mto.com
Email: Ariel.Teshuva@mto.com

Lauren A. Bell (*pro hac vice forthcoming*)
MUNGER, TOLLES & OLSON LLP
601 Massachusetts Ave., NW St.,
Suite 500 E
Washington, D.C. 20001-5369
Telephone: (202) 220-1100
Facsimile: (202) 220-2300
Email: lauren.bell@mto.com

Attorneys for Defendant Snap Inc.

1 WILSON SONSINI GOODRICH & ROSATI
2 Professional Corporation

3 By: /s/ Brian M. Willen

4 Brian M. Willen

5 WILSON SONSINI GOODRICH & ROSATI

6 1301 Avenue of the Americas, 40th Floor

7 New York, New York 10019

8 Telephone: (212) 999-5800

9 Facsimile: (212) 999-5899

10 Email: bwillen@wsgr.com

11 Lauren Gallo White

12 Samantha A. Machock

13 WILSON SONSINI GOODRICH & ROSATI

14 One Market Plaza, Spear Tower, Suite 3300

15 San Francisco, CA 94105

16 Telephone: (415) 947-2000

17 Facsimile: (415) 947-2099

18 Email: lwhite@wsgr.com

19 Email: smachock@wsgr.com

20 Christopher Chiou

21 WILSON SONSINI GOODRICH & ROSATI

22 633 West Fifth Street

23 Los Angeles, CA 90071-2048

24 Telephone: (323) 210-2900

25 Facsimile: (866) 974-7329

26 Email: cchiou@wsgr.com

27 *Attorneys for Defendants YouTube, LLC, Google*
28 *LLC, and Alphabet Inc.*

WILLIAMS & CONNOLLY LLP

By: /s/ Joseph G. Petrosinelli

Joseph G. Petrosinelli

jpetrosinelli@wc.com

Ashley W. Hardin

ahardin@wc.com

680 Maine Avenue, SW

Washington, DC 20024

Telephone.: 202-434-5000

Fax: 202-434-5029

Attorneys for Defendants YouTube, LLC, Google
LLC, and Alphabet Inc.

ATTESTATION

I, Ashley Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: March 6, 2024

By: /s/ Ashley M. Simonsen

Ashley M. Simonsen

[PROPOSED] ORDER

The Court hereby ORDERS the following limitations on discovery, pursuant to the Parties' Stipulation above and the Court's Discovery Management Order No. 3 (ECF 667).

Interrogatories and Requests for Admission

1. Plaintiffs as a group (including the JCCP Plaintiffs)⁵ are allotted a combined total of up to 45 Interrogatories for each of the four main Defendant groups (*i.e.*, Meta, TikTok, Snap, and YouTube). The State AGs are further allotted a combined total of eight (8) additional Interrogatories for the Meta Defendants.

2. Plaintiffs as a group (including the JCCP Plaintiffs) are allotted a combined total of up to 45 Requests for Admission ("RFAs") for each of the four main Defendant groups (*i.e.*, Meta, TikTok, Snap, and YouTube).⁶ The State AGs are further allotted a combined total of up to eight (8) additional RFAs for the Meta Defendants.

3. The Meta Defendants are allotted a combined total of up to 32 identical Interrogatories for each State AG. The Meta Defendants are further allotted a combined total of up to six (6) additional State-specific Interrogatories for each State AG.

4. The Meta Defendants are allotted a combined total of up to 32 identical RFAs for each State AG. The Meta Defendants are further allotted a combined total of up to six (6) additional State-specific RFAs for each State AG.

5. Defendants are allotted a combined total of up to fifteen (15) Interrogatories for each bellwether SD Plaintiff, ten (10) interrogatories for each minor (under age eighteen) bellwether PI Plaintiff, and seven (7) interrogatories for all other bellwether PI Plaintiffs. Defendants are further allotted a combined total of up to 15 RFAs for each bellwether PI Plaintiff and 17 RFAs for each bellwether SD Plaintiff.

⁵ "Plaintiffs" refers to the MDL Personal Injury ("PI") Plaintiffs, MDL School District and Local Government Entity ("SD") Plaintiffs (together with the PI Plaintiffs, the "PI/SD Plaintiffs"), the MDL State Attorneys General ("State AGs"), and the JCCP Plaintiffs.

⁶ The limitations on RFAs set forth in this Order do not include any RFAs that may be needed for purposes of authentication (to the extent the Parties are not able to stipulate to the authentication of documents through other means).

Depositions

6. The PI/SD Plaintiffs are allotted a combined total of up to 240 hours for fact and Rule 30(b)(6) depositions with respect to each of the four main Defendant groups (*i.e.*, Meta, Snap, TikTok, and YouTube). The State AGs are allotted up to an additional 48 hours for such depositions of the Meta Defendants. The length of any such deposition shall not exceed twelve hours per deponent. The Parties shall meet and confer in advance of each deposition regarding estimated time lengths.

7. Hours allotments for fact and Rule 30(b)(6) depositions with respect to the State AGs shall be set forth in a separate, further order.

8. Defendants are allotted a combined total of up to 30 hours for fact depositions of each bellwether PI Plaintiff and a combined total of up to 35 hours for depositions of each bellwether SD Plaintiff. Defendants are allotted a combined total of up to ten (10) hours for Rule 30(b)(6) depositions of each bellwether SD Plaintiff. Depositions of minor bellwether PI Plaintiffs (where minors are those persons under age eighteen (18)) shall be limited to a maximum of three (3) hours in single-defendant cases and a maximum of four (4) hours in multi-defendant cases. Depositions of treating providers in any given bellwether PI case may not exceed five (5) hours of questioning by the Defendants.

9. Depositions of all other witnesses in any given bellwether PI case may not exceed seven (7) hours of questioning by the Defendants, and depositions of all other witnesses in any given bellwether SD case may not exceed ten (10) hours of questioning by the Defendants. The Parties shall meet and confer in advance of each deposition regarding estimated time lengths.

10. For good cause shown, a Party may seek an expansion or contraction of the discovery limits set forth above on a case-by-case basis or in a specific instance. Any Party seeking an expansion or contraction of the hours limit for a particular deposition shall meet and confer with the other side in advance of the deposition and, if the Parties are unable to agree on the requested expansion or contraction, the Party seeking the modification may raise the dispute with the Court in accordance with the Court's procedures for resolving discovery disputes. However, nothing in this agreement shall be used to delay or alter the ordered limitations of a properly noticed deposition should the dispute not be resolved before the date of the noticed deposition.

1 **IT IS SO ORDERED.**

2
3 Dated: _____

MAGISTRATE JUDGE PETER H. KANG